

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERM COMMODITIES COTTON : Master Docket
: No. 12-cv-5126 (ALC) (KNF)
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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS' MOTION FOR
LEAVE TO FILE UNDER SEAL**

1. The Stipulated Protective Order [Dkt. No. 106] entered by the Court on April 30, 2014 governs the management of information produced in this action that is designated "Confidential" or "Highly Confidential."

2. The Stipulated Protective Order, and Section 7.C. of this Court's Individual Practices, requires a party seeking to file "Confidential" or "Highly Confidential" information under seal to first obtain leave of Court. Requests for sealing are required to include proposed redactions to the sealed materials.

3. Pursuant to the Stipulated Protective Order, Defendants and certain non-parties have designated materials produced in discovery and deposition testimony as "Confidential" or "Highly Confidential."

4. Plaintiffs have prepared objections to certain rulings made by Magistrate Judge Fox on December 16, 2015. Plaintiffs' objections references and/or quotes documents and/or deposition testimony that have been designated "Confidential" or "Highly Confidential."

5. Plaintiffs are hand delivering their complete un-redacted objections to Chambers and are emailing same to Defendants. Plaintiffs' proposed redactions to their objections are attached as Exhibit A hereto.

6. Accordingly, Plaintiffs respectfully request that the Court authorize Plaintiffs to file their objections under seal.

Dated: New York, New York
December 30, 2015

Respectfully submitted,

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